

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

FELICIA BYERS,)	
)	
Plaintiff,)	
)	CA No. 05-711 (GMS)
v.)	
)	
HSBC PAY SERVICES INC.,)	
)	Trial by Jury Demanded
Defendant.)	

7.1(a) DISCLOSURE STATEMENT

Pursuant to Rule 7.1(a) of the Federal Rules of Civil Procedure, the undersigned counsel for defendant HSBC Pay Services Inc. discloses that HSBC Pay Services Inc. is a wholly owned subsidiary of HSBC Finance Corporation (f/k/a Household International, Inc.) which is a wholly owned subsidiary of HSBC Holdings plc, a United Kingdom corporation. HSBC Holdings shares are traded in the United States as American Depositary Shares on the New York Stock Exchange.



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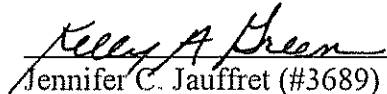
Dated: October 31, 2006

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2006, I electronically filed the foregoing 7.1(a) Disclosure Statement with the Clerk of Court using CM/ECF which will send notification of such filing to the following and on October 31, 2006, mailed, via first class mail, postage prepaid, copies of the same to:

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